

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION**

IN RE:

**Maurice Mc Laughlin**

Debtors

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CASE NO.: **09:16-bk-8283-FMD**  
CHAPTER 13

**RESPONSE AND OBJECTION TO MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY [Doc. 18 and 20]**

COMES NOW, DEBTOR, by and through undersign counsel and files his response and objection to Creditors Eagle Creek Community Association, Inc. and Eagle Creek Golf and Country Club, Inc. Motions for Relief From the Automatic Stay [Docs. 18 and 20] and in support thereof states:

1. Both Creditors filed Motions for Relief on December 2, 2016 and December 6, 2016 respectively.
2. Debtor has proposed a Chapter 13 Plan to Avoid Liens of both creditors as he believes the value of the property as of the date of filing the petition was less than what is owed to the First Mortgage Holder.
3. Debtor will amend the Plan to provide all future assessments coming due to be paid through the plan.
4. The next assessment becomes due on January 1, 2017.
5. Debtor will also file his motion to value and avoid the liens by both creditors with this Court.
6. As such, Debtor objects to both Motions for Relief and requests a hearing on all matters.

WHEREFORE, Debtor respectfully requests this Honorable Court Deny the Motion(s)

for Relief and grant any further relief to the Debtor that this Court finds just and Proper.

**CERTIFICATE OF SERVICE**

I HEREBY certify that on September 21, 2016 I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that the foregoing was provided electronically or by U.S. Mail to: Gregory A Champeau, Attorney for Eagle Creek Golf and Country Club, Inc. and Eagle Creek Community Association, Inc.

The Hamisch Law Firm, PLLC  
501 Goodlette Frank Rd, Suite A-210  
Naples, FL 34102  
Phone (239) 216-4783  
Fax (239) 206-4155

/s/ Alan F. Hamisch  
Alan F. Hamisch, Esq.  
FBN: 88647